

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

SIGNIFY NORTH AMERICA CORPORATION
and SIGNIFY HOLDING B.V.

Plaintiffs,

v.

SATCO PRODUCTS, INC.

Defendant.

Civil Action No. 2:19-cv-06125-JMA-SIL

STIPULATION AND PROPOSED ORDER

WHEREAS there are certain ITC Materials which are protected from disclosure under a Protective Order in U.S. International Trade Commission Investigation No. 337-TA-1081 (the “ITC Protective Order”);

WHEREAS such certain ITC Materials comprise confidential business information of one or more Respondents not parties to the present action;

WHEREAS such certain ITC Materials are the subject of discovery requests in the present action;

WHEREAS on December 16, 2020, the Court entered the Parties’ Proposed Order Concerning Disclosure of ITC Materials (Dkt. 113) (“the Order”);

WHEREAS pursuant to the Order, Defendant Satco Products, Inc. (“Satco”) provided notice to and conferred with the other Respondents in U.S. International Trade Commission Investigation No. 337-TA-1081;

WHEREAS on December 30, 2020, Third-Party Feit Electric Company, Inc. (“Feit Electric”) filed objections in response to the Order (Dkt. No. 118);

WHEREAS the Parties and Feit Electric have agreed that ITC Materials such as expert reports, expert deposition transcripts, expert witness statements, expert demonstratives, and Signify (f/k/a Philips Lighting North America Corp. and Philips Lighting Holding B.V.) or Satco discovery responses comprising confidential information of the other ITC Respondents not parties to the present action and protected under the ITC Protective Order may be produced in the present action if such confidential information is redacted;

WHEREAS counsel for the parties producing ITC Materials in the present action agree that they bear the responsibility for ensuring that, except as expressly permitted by this Stipulation and the Proposed Order, the ITC Protective Order is honored and followed;

WHEREAS counsel for the Parties and Feit Electric have approved this Stipulation and the Proposed Order submitted herewith; and,

WHEREAS this Stipulation and Proposed Order addresses the concerns raised in the objections filed by Feit Electric.

NOW, THEREFORE:

1. Satco shall produce ITC Materials such as expert reports, expert deposition transcripts, expert witness statements, expert demonstratives, and Signify (f/k/a Philips Lighting North America Corp. and Philips Lighting Holding B.V.) or Satco discovery responses, in which confidential information of the other ITC Respondents not parties to the present action, including Feit Electric, is redacted;

2. The Parties and Feit Electric agree to the entry of a Court Order in the form of the Proposed Order submitted herewith.

3. In view of this Stipulation and the Proposed Order, the hearing scheduled for February 4, 2021 appears to be unnecessary and may be cancelled.

Dated: January 29, 2021

Respectfully submitted,

/s/ Nicholas A. Brown

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Attorneys for Third-Party Feit Electric Company, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties.

/s/ Nicholas A. Brown
Nicholas A. Brown

Attorney for Defendant